

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE INTUNIV ANTITRUST
LITIGATION

C.A. No. 16-cv-12653-ADB

This Document Relates to:
Direct Purchaser Actions

**DIRECT PURCHASERS' MOTION FOR FINAL APPROVAL
OF PROPOSED SETTLEMENT WITH DEFENDANT ACTAVIS**

Pursuant to Fed. R. Civ. P. 23(e), direct purchaser plaintiff Meijer, Inc. and Meijer Distribution, Inc. ("Meijer" or "Plaintiff"), individually and on behalf of the certified Direct Purchaser Class ("Direct Purchaser Class"), hereby respectfully requests that the Court grant final approval of the proposed settlement with defendant Actavis Elizabeth LLC, Actavis LLC, and Actavis Holdco US, Inc. ("Actavis"). In support of this motion, direct purchasers submit their Memorandum in Support of Direct Purchasers' Motion for Final Approval of the Proposed Settlement with Actavis, dated Nov. 24, 2020, along with the following exhibits:

Exhibit A. [Proposed] Order Granting Final Judgment and Order of Dismissal Approving Direct Purchaser Class Settlement with Actavis and Dismissing Direct Purchaser Class Claims against Actavis, previously submitted with direct purchasers' motion for preliminary approval dated September 1, 2020, as ECF No. 480-4.

Exhibit B. List of the court documents posted for review on Claim Administrator A.B. Data, Ltd.'s website established for this settlement, <http://www.intunivantitrustsettlement.com/> ("Court Documents" page).

Exhibit C. Declaration of Eric Miller, Senior Vice President, A.B. Data, Regarding Notice of Settlement to the Direct Purchaser Class, dated Nov. 20, 2020.

Exhibit D. Plan of Allocation Direct Purchaser Plaintiffs' [Proposed] Plan of Allocation for the Direct Purchaser Class, previously submitted to the Court as ECF No. 480-7, and Declaration of Jeffrey J. Leitzinger, Ph.D. Related to Proposed Allocation Plan and Net Settlement Fund Allocation, dated August 28, 2020, previously submitted to the Court as ECF No. 480-8.

WHEREFORE, for the reasons set forth herein and in direct purchasers' prior submissions, the motion for final approval of the proposed settlement with defendant Actavis should be granted.

Dated: November 24, 2020

Respectfully submitted,

/s/ Lauren G. Barnes

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CERTIFICATE OF SERVICE

I, Lauren G. Barnes, certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 24, 2020.

/s/ **Lauren G. Barnes**